

# **Exhibit A**

### **Exhibit A – Plaintiffs’ Proposed Schedule**

#### **Fact Discovery**

- **Rolling Document Productions Begin:** September 30, 2022
- **Substantial Completion of Transactional Data Production:** March 1, 2023
- **Substantial Completion of Parties’ Document Productions:** May 1, 2023
- **Final Deadline for Service of Third-Party Document Subpoenas:** July 1, 2023
- **Deadline to Amend Complaint(s):** March 1, 2023
- **Close of Fact Discovery:** October 31, 2023

#### **Class Certification**

- **Motion for Class Cert/Plaintiffs’ Class Cert Expert Report(s):** January 15, 2024
- **Opposition to Class Cert/Valve Class Cert Expert Report(s)/*Daubert* Motions on Plaintiffs’ Class Cert Expert(s):** March 18, 2024
- **Class Certification Reply/Plaintiffs’ Rebuttal Expert Report(s)/Plaintiffs’ *Daubert* Oppositions/*Daubert* Motions on Valve’s Class Cert Expert(s):** May 13, 2024
- **Deadline to Complete Class Cert Expert Discovery:** May 27, 2024
- **Valve’s *Daubert* Replies/Valve’s Opposition to *Daubert* Motions:** June 10, 2024
- **Plaintiffs’ *Daubert* Replies:** June 24, 2024

#### **Summary Judgment & Merits Expert Discovery**

- **Opening Merits Expert Report(s) (on issues for which the party bears the burden):** 60 days after any grant of class certification
- **Response Merits Expert Report(s):** 120 days after any grant of class certification
- **Rebuttal Merits Expert Report(s):** 150 days after any grant of class certification
- **Close of Merits Expert Discovery:** 165 days after any grant of class certification
- **Last day to file Motions for Summary Judgment/*Daubert* Motions on Merits Experts:** 180 days after any grant of class certification<sup>1</sup>
- **Oppositions to MSJs/*Daubert* Motions:** 240 days after any grant of class certification<sup>2</sup>
- **Replies to MSJs/*Daubert* Motions:** 270 days after any grant of class certification

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<sup>1</sup> By setting a last day to file dispositive motions, the parties do not waive or restrict any rights they otherwise have to seek summary judgment at an earlier stage of the case, including prior to class certification or notice. Each side, however, shall be able to make only one motion for summary judgment in this case.

<sup>2</sup> Agreed opposition and reply dates listed here apply to summary judgment motions filed 210 days after any grant of class certification. The parties agree to meet and confer regarding opposition and reply dates for any earlier filed summary judgment motion if either party believes the default opposition and/or reply dates under the Local Rules are inadequate. If the parties are unable to agree on a schedule, they will submit their competing proposals to the Court for its decision.